

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

United States of America,
Plaintiff,

vs.

1. Samuel Rappylee Bateman,
2. Naomi Bistline,
3. Donnae Barlow, and
4. Moretta Rose Johnson,
Defendants.

No. CR-22-08092-PCT-DGC

**[PROPOSED] AMENDED
PROTECTIVE ORDER**

Pursuant to Federal Rule of Criminal Procedure 16(d)(1), the United States' motion, no objection from the defendants, and good cause appearing,

IT IS HEREBY ORDERED that the United States' motion for a protective order is GRANTED.

IT IS FURTHER ORDERED that:

1. The United States may disclose to defense counsel, without redaction, the discovery materials, which include private and personally identifying information (collectively "PII").

2. Defense counsel may share these materials with members of the defense teams, including experts, investigators, and other professionals retained by the defendants or defense counsel to assist in the preparation of their defenses.

3. The defense teams shall safeguard and shall not disclose the materials

1 provided to them, other than to the extent necessary to prepare their defenses.

2 4. The defense teams may review these materials with the defendants and
3 potential witnesses to the extent necessary to prepare their defenses.

4 5. The defendants and potential witnesses shall not be allowed to retain any of
5 these materials during the course of the litigation.

6 6. The defense teams shall destroy, at the conclusion of this matter, all of these
7 discovery materials in their possession, except that defense counsel shall be allowed to
8 retain these materials until the time expires for all appeals, collateral attacks, other writs or
9 motions challenging the conviction or sentence, and actions for professional malpractice.

10 **IT IS FURTHER ORDERED** that excludable delay under 18 U.S.C. § 3161(h)
11 _____ will commence on _____ for a total of
12 _____ days.